

REMARKS

In response to the Office Action, claims 1, 11-16, & 19-20 have been amended.

Therefore, claims 1-20 remain pending. Support for the instant amendments is provided throughout the as-filed Specification. Thus, no new matter has been added. In view of the foregoing amendments and following comments, allowance of all the claims pending in the application is respectfully requested.

A. **DRAWINGS**

The Examiner has objected to the drawings for various alleged informalities, as well as for the alleged failure to include various drawing figures with the application, as filed. *See* Office Action, pgs. 2-3, ¶'s 2-6.

Applicants have cancelled drawing figures 1, 2, 3, 3A, 4, 5, 6, 7, 8, 9, and 10 that were originally filed on September 13, 2000. Further, Applicants have submitted herewith, a “***REQUEST FOR APPROVAL OF SUBSTITUTE DRAWING FIGURES***” enclosing new drawing figures 1A, 1B, 1C, 2, 3A, 3B, 3C, 4, 5, 6A, 6B, 6C, 7, 8, 9, and 10. Applicants submit that the substitute drawing figures do not constitute the addition of new matter, as support for the substitute drawing figures is provided throughout the as-filed Specification, as set forth below:

1. **FIG. 1A** – FIG. 1A was originally submitted as FIG. 1. As such, support for FIG. 1A may be found in FIG. 1, as originally filed. Support for FIG. 1A may also be found in the Specification as-filed, in *at least*: pg. 15, line 13; and pg. 21, lines 5+.

2. FIG. 1B - FIG. 1B was originally submitted as FIG. 2. As such, support for FIG. 1B may be found in FIG. 2, as originally filed. Support for FIG. 1B may also be found in the Specification as-filed, in *at least*: pg. 15, line 15; and pg. 28, lines 3+ (as amended).

3. FIG. 1C - FIG. 1C was originally submitted as FIG. 3. As such, support for FIG. 1C may be found in FIG. 3, as originally filed. Support for FIG. 1C may also be found in the Specification as-filed, in *at least*: pg. 15, line 17; and pg. 34, lines 3+.

4. FIG. 2 – FIG. 2 was originally submitted as FIG. 3A. As such, support for FIG. 2 may be found in FIG. 3A, as originally filed. Support for FIG. 2 may also be found in the Specification as-filed, in *at least*: pg. 15, line 19; and pg. 36, lines 10+.

5. FIG. 3A – FIG. 3A was originally submitted as FIG. 4. As such, support for FIG. 3A may be found in FIG. 4, as originally filed. Support for FIG. 3A may also be found in the Specification as-filed, in *at least*: pg. 15, line 21; and pg. 36, lines 18+ (as amended).

6. FIG. 3B – FIG. 3B was originally submitted as FIG. 5. As such, support for FIG. 3B may be found in FIG. 5, as originally filed. Support for FIG. 3B may also be found in the Specification as-filed, in *at least*: pg. 16, line 1; and pg. 39, lines 9+.

7. FIG. 3C – FIG. 3C was originally submitted as FIG. 6. As such, support for FIG. 3C may be found in FIG. 6, as originally filed. Support for FIG. 3C may also be found in the Specification as-filed, in *at least*: pg. 16, line 3; and pg. 45, lines 10+ (as amended).

8. FIG. 4 - Support for FIG. 4 may be found in the Specification as-filed, in *at least*: pg. 16, line 5; and pg. 50, lines 6+.

9. FIG. 5 - Support for FIG. 5 may be found in the Specification as-filed, in *at least*: pg. 16, line 7; and pg. 51, lines 20+.

10. FIG. 6A - Support for FIG. 6A may be found in the Specification as-filed, in *at least*: pg. 16, line 9; and page 53, lines 9+.
11. FIG. 6B - Support for FIG. 6B may be found in the Specification as-filed, in *at least*: pg. 16, line 11; and pg. 53, lines 9+.
12. FIG. 6C - Support for FIG. 6C may be found in the Specification as-filed, in *at least*: pg. 16, line 13; pg. 53, lines 9+; and pg. 57, lines 1+.
13. FIG. 7 - Support for FIG. 7 may be found in the Specification as-filed, in *at least*: pg. 16, line 15; and pg. 57, lines 12+.
14. FIG. 8 – FIG. 8 is the same FIG. 8 that was originally filed.
15. FIG. 9 – FIG. 9 is the same FIG. 9 that was originally filed.
16. FIG. 10 – FIG. 10 is the same FIG. 10 that was originally filed.

Accordingly, Applicants respectfully request that the Examiner approve the substitute drawing figures.

B. **SPECIFICATION**

The Examiner has objected to the Specification for various alleged informalities. *See* Office Action, pg. 4, ¶'s 7-8. In response, Applicants have checked the Specification and amended various paragraphs to correct typographical errors, and to ensure that the reference characters set forth in the Specification are commensurate with those illustrated in the drawing figures. Applicants respectfully disagree, however, with two objections set forth by the Examiner.

First, Applicants have not amended the title of the invention as suggested by the Examiner. Pursuant to 37 C.F.R. §1.72, Applicants respectfully submit that the title is less than 500 characters, is as short and specific as possible, and, contrary to the assertion set forth by the Examiner (*see* Office Action, pg. 4, ¶8), descriptive and indicative of the invention to which the claims are directed. The invention disclosed and claimed is directed toward utilizing voice-enabled input for creating and automatically deploying personalized, dynamic and interactive voice services. Accordingly, Applicants request that this objection be withdrawn.

Second, Applicants have not amended the Abstract of the invention. The Examiner alleges that the term “voice recognition” should be replaced with “speech recognition” in line 4 of the Abstract. *See* Office Action, pg. 4, ¶7. Applicants contend that “voice recognition” fails to appear in line 4 of the Abstract. Moreover, the term “voice recognition” as it appears in the last line of the Abstract is consistent with the definition of “voice recognition” set forth by the Examiner in the Preamble to the Office Action (*see* Office Action, pg. 2, ¶1). The Examiner has defined “voice recognition” as identifying individuals by sound. In the Abstract, Applicants refer to identifying subscribers via voice recognition. Accordingly, withdrawal of this objection is earnestly sought.

C. **REJECTIONS UNDER 35 U.S.C. §102 and 35 U.S.C. §103**

The Examiner relies on the Richard *et al.* (“Richard”) (U.S. Patent No. 5,924,068), Meador III *et al.* (“Meador”) (U.S. Patent No. 5,638,425), Logan *et al.* (“Logan”) (U.S. Patent No. 5,721,827), and Csaszar *et al.* (“Csaszar”) (U.S. Patent No. 5,970,124) references

for the alleged rejections of claims 1-20. Applicants respectfully disagree with these rejections. However, in the interest of expediting prosecution, the claims have been amended to clarify various points of novelty over the references of record.

In particular, independent claims 1 and 11 have been amended to recite that the system and method of the invention, respectively, enable initiation of an outbound communication to a voice service subscriber to commence a voice service session. Richard, Logan, Meador, and Csaszar, by contrast, do not appear to disclose this functionality.

Richard appears to disclose, for example, a method wherein a modem associated with a receiver (130) on a subscriber or client side initiates contact with a transmitter (120) to download an electronic edition of a newspaper (see, e.g., FIG. 10).

Logan appears to disclose a system wherein subscribers download files (e.g., programming) via a player (on the client side) initiating a dial-up connection to a local Internet service provider which provides an Internet connection to a host FTP server (see, e.g., col. 6, lns. 61+).

Medor discloses a directory assistance system which appears to require a caller to initiate a session by placing a directory assistance call. (see, e.g., Abstract).

Csaszar appears to disclose a sponsored information distribution method and apparatus wherein "*the consumer initiates activity by calling the interactive voice response system.*" See Abstract.

Thus, neither Richard, Logan, Meador, nor Csaszar appear to teach the feature of initiating an outbound communication to a voice service subscriber to commence a voice service session. For at least the reasons set forth above, Applicants respectfully submit that

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none of the references cited by the Examiner, either alone or in combination, teach all of the limitations of independent claims 1 and 11. Accordingly, Applicants further submit that dependent claims 2-10, and 19-20 are allowable because they depend from allowable independent claims, as well as for the further limitations they contain.

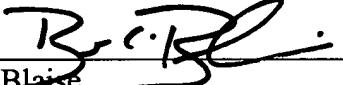
CONCLUSION

Having addressed each of the foregoing rejections, it is respectfully submitted that this application is now in condition for allowance. Notice to that effect is respectfully requested. In the event that the Examiner believes that a telephone conference would expedite allowance of the application, the Examiner is invited to telephone the undersigned with any suggestions leading to the allowance of the application.

Respectfully submitted,

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